

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth.**

**CERTIFICATE OF NO OBJECTION AND REQUEST FOR ENTRY, WITHOUT A
HEARING, OF ORDER GRANTING FIFTY-FIRST OMNIBUS OBJECTION (NON-
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO DUPLICATE
CLAIMS OF PRASA BONDHOLDERS**

On June 12, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the representative of the Commonwealth, pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² filed, among others, the *Fifty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Duplicate Claims of PRASA Bondholders* [ECF No. 7279] (the “Fifty-First Omnibus Objection”).

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA” and together with the Commonwealth, COFINA, HTA, and ERS, the “Debtors”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

Responses, if any, to the Fifty-First Omnibus Objection were to be filed and served no later than July 9, 2019 at 4:00 p.m. (Atlantic Time) (the “Objection Deadline”). While no responses to the Fifty-First Omnibus Objection were filed, the advisors for the Oversight Board conducted a secondary review of the claims subject to the Fifty-First Omnibus Objection, and, as a result of this review, the Commonwealth voluntarily withdrew objections to certain claims subject to the Fifty-First Omnibus Objection. These efforts resulted in the filing, on July 18, 2019, of an amended proposed order and schedule of claims subject to the Fifty-First Omnibus Objection. *See Attachment 4 to Notice of (A) Withdrawal of Objections to Certain Claims and (B) Submission of Amended Exhibits to Claim Objections* [ECF No. 8093-4].

According to this Court’s *Tenth Amended Case Management Procedures* [Case No. 17-03283-LTS, ECF No. 8027-1] (the “Case Management Procedures”) and *Order Further Amending Case Management Procedures* [ECF No. 8027], the Court may enter an order granting a request for relief without a hearing upon receipt of a certificate of no objection (“CNO”, as defined by the Case Management Procedures). *See Case Management Procedures*, Section III, paragraph P.

In accordance with the Case Management Procedures, the undersigned hereby certifies that this CNO is filed not less than forty-eight (48) hours after the expiration of the Objection Deadline. The undersigned further certifies that counsel for the Commonwealth has reviewed the Court’s docket in the above-captioned case not less than forty-eight (48) hours after expiration of the Objection Deadline, and, to the best of counsel’s knowledge, no applicable objection, responsive pleading, or request for a hearing with respect to the Objection appears on the docket.

WHEREFORE the Commonwealth respectfully requests that the Court enter the proposed order attached hereto as **Attachment 1**, which is identical to the amended proposed order and schedule of claims subject to the Fifty-First Omnibus Objection filed July 18, 2019.

Dated: July 23, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Ricardo Burgos Vargas

Ricardo Burgos Vargas
A&S LEGAL STUDIO, PSC

434 Ave. Hostos

San Juan, PR 00918

Tel: (787) 751-6764

Fax: (787) 763-8260

*Attorneys for the Financial
Oversight and Management Board,
as representative for the
Commonwealth of Puerto Rico*

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

PROSKAUER ROSE LLP

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

*Co-Attorneys for the Financial
Oversight and Management Board,
as representative for the
Commonwealth of Puerto Rico*